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13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 OAKLAND DIVISION

16 UNITED STATES OF AMERICA,) NO. 4:25-mj-70874-MAG-1
 17 Plaintiff,)
 18 v.) STIPULATION TO CONTINUE STATUS
 19 JAMIE NUNEZ HERNANDEZ,) CONFERENCE AND EXCLUDE TIME FROM
 20 Defendant.) AUGUST 26, 2025 TO SEPTEMBER 23, 2025 AND
 21) [PROPOSED] ORDER
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20 It is hereby stipulated by and between counsel for the United States and counsel for the
 21 defendant, Jamie Nunez Hernandez, that time be excluded under the Speedy Trial Act and under Fed. R.
 22 Crim. P. Rule 5.1 from August 26, 2025 through September 23, 2025.

23 The parties have entered into a protective order and initial discovery has been produced. The
 24 government is in the process of preparing a second round of discovery to the defense. Defense counsel
 25 needs time to review the discovery as well as to meet with the defendant, who is in custody in Martinez,
 26 California. Additionally, the parties are discussing a potential plea resolution, including the possibility of
 27 a potential pre-indictment resolution. The parties need additional time to discuss and negotiate a
 28 resolution. The parties will be better prepared to update the Court as to the status of the case on
 September 23, 2025.

29 STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER
 Case No. 4:25-mj-70874-MAG-1

30 **FILED**

31 **AUG 25 2025**

32 CLERK, U.S. DISTRICT COURT
 33 NORTHERN DISTRICT OF CALIFORNIA

The government and counsel for the defendant agree that time be excluded under the Speedy Trial Act so that defense counsel can continue to prepare, including by reviewing the discovery already produced and reviewing discovery that will be produced shortly. For this reason and as further stated above, the parties stipulate and agree that continuing the status conference and excluding time until September 23, 2025, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from August 26, 2025 through September 23, 2025 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

10 Additionally, based on the facts set forth above, and with the consent of the defendant, and
11 taking into account the public interest in the prompt disposition of criminal cases, the parties agree that
12 good cause exists for extending the time limits for a preliminary hearing under Federal Rule of Criminal
13 Procedure 5.1 and for extending the 30-day time period for an indictment under the Speedy Trial Act
14 (based on the exclusions set forth above). See Fed. R. Crim. P. 5.1; 18 U.S.C. § 3161(b).

15 The undersigned Assistant United States Attorney certifies that she has obtained approval from
16 counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED

DATED: 8/25/2025

/s/
EMILY R. DAHLKE
Assistant United States Attorney

DATED: 8/25/2025

/s/
ELISSE LA ROUCHE
Counsel for Defendant JAMIE NUNEZ
HERNANDEZ

1 [PROPOSED] ORDER

2 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the
3 Court finds that it is appropriate to continue the status conference from August 26, 2025 to September
4 23, 2025. Further, the Court finds that failing to exclude the time from August 26, 2025 through
5 September 23, 2025, would unreasonably deny defense counsel and the defendant the reasonable time
6 necessary for effective preparation, taking into account the exercise of due diligence 18 U.S.C. §
7 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from
8 August 26, 2025, through September 23, 2025, from computation under the Speedy Trial Act outweigh
9 the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the
10 parties, IT IS HEREBY ORDERED that the status conference be continued to September 23, 2025, and
11 that the time from August 26, 2025 through September 23, 2025, shall be excluded from computation
12 under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

13 The Court also finds good cause for extending the time limits for a preliminary hearing under
14 Federal Rule of Criminal Procedure 5.1 and for extending the 30-day time period for an indictment
15 under the Speedy Trial Act (based on the exclusions set forth above). *See* Fed. R. Crim. P. 5.1; 18
16 U.S.C. § 3161(b) to September 23, 2025.

17 IT IS SO ORDERED.

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19 DATED: 8/25/25



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DONNA M. RYU
United States Magistrate Judge